

JORDAN ETH (CA SBN 121617)
JEth@mofo.com
ANNA ERICKSON WHITE (CA SBN 161385)
AWhite@mofo.com
CRAIG D. MARTIN (CA SBN 168195)
CMartin@mofo.com
STUART C. PLUNKETT (CA SBN 187971)
SPlunkett@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522

Attorneys for Defendants
DENNIS WU, JOSEPH J. JOU, LI-LIN KO,
GODWIN S. WONG, DAVID NG, DANIEL P.
RILEY, AND RICHARD LI-CHUNG WANG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KYUNG CHO; REX DECHAKUL; AND
DAVID HWANG; INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

v.

UCBH HOLDINGS, INC.; THOMAS S. WU;
THOMAS YU; EBRAHIM SHABUDIN; CRAIG
ON; DENNIS WU; ROBERT NAGEL;
JOHN M. KERR; DANIEL M. GAUTSCH;
DOUGLAS MITCHELL; BURTON D.
THOMPSON; JOHN CINDERREY; JOSEPH J.
JOU; LI-LIN KO; QINGYUAN WAN; GODWIN
WONG; DAVID NG; DANIEL P. RILEY;
RICHARD LI-CHUNG WANG; and JOHN
DOES 1-10,

Defendants.

Master Case No. CV-09-4208-JSW
(Consolidated)

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE**

Judge: Jeffery S. White

1 WHEREAS, Plaintiffs filed their Consolidated Amended Complaint for Violations of the
2 Federal Securities Laws on August 10, 2010;

3 WHEREAS, this Court entered an Order on September 16, 2014, staying this case until
4 the conclusion of *United States v. Shabudin and Yu*;

5 WHEREAS, this Court entered an Order on April 21, 2015, lifting the stay, referring the
6 parties to Judge Beeler for the purposes of completing a settlement conference by July 21, 2015,
7 and setting a case management conference for July 31, 2015 at 11:00 a.m.;

8 WHEREAS, the parties have had several telephonic conferences with Judge Beeler, most
9 recently on June 25, 2015;

10 WHEREAS, the parties have reached an impasse regarding whether certain insurance-
11 related disclosures would be made by Defendants in the course of mediation;

12 WHEREAS, Plaintiffs have determined that they will file a motion to compel if an
13 agreement regarding the disclosure is not reached;

14 WHEREAS, Judge Beeler issued a minute order setting an in-person settlement
15 conference to be held after the disclosure issue is resolved (Docket No. 352);

16 WHEREAS, while the parties were in the process of meeting and conferring regarding
17 Plaintiffs' anticipated motion to compel discovery, the parties made progress negotiating a
18 potential compromise;

19 WHEREAS, the parties are working to resolve the disclosure issue and believe that issue
20 must be resolved before the parties can have a meaningful settlement conference with Judge
21 Beeler;

22 WHEREAS, Defendants do not believe resolution of the disclosure issue can be
23 completed in time to hold a settlement conference by July 21, 2015, because the proposed
24 compromise would require consent of non-parties; and

25 WHEREAS, Plaintiffs will file a motion to compel to resolve the disclosure issue in the
26 event that a satisfactory compromise is not reached.

27 THEREFORE, IT IS STIPULATED AND AGREED, by and among the parties and their
28 respective counsel of record, that the Case Management Conference in this matter currently

1 scheduled for July 31, 2015, should be continued, and ask that the Court continue the Case
2 Management Conference to November 13, 2015, or as soon thereafter as the Court shall require,
3 to allow additional time for completion of the settlement conference.

4
5 Dated: July 17, 2015

MORRISON & FOERSTER LLP

6
7 By: \s\ Stuart C. Plunkett
8 Stuart C. Plunkett
9 Attorneys for Outside Director Defendants
10 Dennis Wu, Joseph J. Jou, Li-Lin Ko, Godwin S.
11 Wong, David Ng, Daniel P. Riley and Richard Li-
12 Chung Wang

13
14 Dated: July 17, 2015

LATHAM & WATKINS LLP

15 By: \s\
16 Steven M. Bauer
17 Attorneys for Defendant Thomas S. Wu

18
19 Dated: July 17, 2015

COOPER, WHITE & COOPER LLP

20 By: \s\
21 Edward L. Seidel
22 Attorneys for Defendant Thomas Yu

23
24 Dated: July 17, 2015

ROSEN BIEN GALVAN & GRUNFELD LLP

25 By: \s\
26 Jeffrey L. Bornstein
27 Attorneys for Defendant Burton D. Thompson
28

1 Dated: July 17, 2015

BERGESON, LLP

2
3 By: s

4 Caroline McIntyre
5 Attorneys for Defendants Daniel M. Gautsch,
6 Douglas Mitchell, and Robert Nagel

7 Dated: July 17, 2015

FARELLA BRAUN + MARTEL
LLP

8
9 By: s

10 William P. Keane
11 Attorneys for Defendant John M. Kerr

12 Dated: July 17, 2015

SWANSON & MCNAMARA LLP

13
14 By: s

15 Mary McNamara
16 Attorneys for Defendant John Cinderey

17 Dated: July 17, 2015

MURPHY, PEARSON, BRADLEY & FEENEY

18
19 By: s

20 James A. Lassart
21 Attorneys for Defendant Ebrahim Shabudin

22 Dated: July 17, 2015

CLARENCE DYER & COHEN LLP

23
24 By: s

25 Nanci L. Clarence
26 Attorneys for Defendant Craig S. On

Dated: July 17, 2015

THE ROSEN LAW FIRM P.A.

By: \s\
 Laurence M. Rosen
 Attorneys for Plaintiffs Kyung Cho, Rex Dechakul,
 and David Hwang, Individually and on behalf of All
 Others Similarly Situated

ATTESTATION

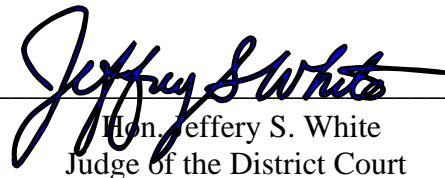
I, Stuart C. Plunkett, am the ECF User whose ID and password are being used to file this
**STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT
CONFERENCE.** In compliance with Civil L.R. 5-1, I hereby attest that Steven M. Bauer,
Edward L. Seidel, Jeffrey L. Bornstein, Caroline McIntyre, William P. Keane, Mary McNamara,
James A. Lassart, Nanci L. Clarence, and Laurence M. Rosen concurred in this filing.

PROPOSED ORDER

Pursuant to stipulation, and good cause appearing therefore, IT IS HEREBY ORDERED THAT the Case Management Conference scheduled for July 31, 2015, at 11:00 a.m. is continued to Nov. 13, 2015, at 11:00 a.m.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 20, 2015


Hon. Jeffery S. White
Judge of the District Court